

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IME WATCHDOG, INC.,

Plaintiff,

v.

SAFA ABDULRAHIM, VITO GELARDO,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

Case No. 22-cv-01032-PKC-
JRC

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Eric S. Allen, Esq., hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for 3 non-party corporate witnesses of Giant Partners Inc. in the above-captioned action at the September 25, 2024 hearing.

I am in good standing of the bar of the State of Utah and there are no pending disciplinary proceedings against me in any state or federal court.

Respectfully submitted, this 23th day of September 2024.

ALLEN, MITCHELL & ALLEN, PLLC

/s/ Eric S. Allen

Eric S. Allen, Esq.

2091 E. Murray Holladay Road, Suite 21

Salt Lake City, Utah 84117

T: (801) 930-1117

Eric@allenlawyer.com

Attorneys for Non-Party Giant Partners Inc.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IME WATCHDOG, INC.,

Plaintiff,

v.

SAFA ABDULRAHIM, VITO GELARDO,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

Case No.: 22-cv-01032-PKC-
JRC

**DECLARATION OF ERIC S. ALLEN IN SUPPORT OF MOTION FOR ADMISSION PRO
HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Court for the Eastern and Southern Districts of New York and 28 U.S.C. § 1746, I, Eric S. Allen declare the following:

1. I am an attorney with the firm ALLEN, MITCHELL & ALLEN, PLLC.
2. I am a member in good standing of the State of Utah.
3. I have never been censured, suspended, disbarred or denied admission or readmission of any court.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. Attached to this declaration are true and accurate copies of certificates of good standing from the State of Utah and The United States District Court, District of Utah.
6. I declare under penalty of perjury the foregoing is true and correct.

Executed on September 20, 2024

/s/ Eric S. Allen
Eric S. Allen, Esq.

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IME WATCHDOG, INC.,

Plaintiff,

v.

SAFA ABDULRAHIM, VITO GELARDO,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

Case No. 22-cv-01032-PKC-
JRC

ORDER FOR ADMISSION *PRO HAC VICE*

The motion of Eric S. Allen (“Applicant”) for admission to practice Pro Hac Vice in the above-caption action is GRANTED.

Applicant has declared that he is a member in good standing of the bar of the State of Utah and his contact information is as follows:

Eric S. Allen, Esq.
2091 E. Murray Holladay Road, Suite 21
Salt Lake City, Utah 84117
T: (801) 930-1117
Eric@allenlawyer.com

Applicant having request admission Pro Hac Vice to appear for all purposes as counsel for Non-Party Giant Partners Inc. in the above-caption action;

IT IS HEREBY ORDERED that Applicant is admitted to practice Pro Hac Vice in the above-caption case in the United States District Court for the Eastern District of New York. All attorney appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: This ____ day of _____, 2024

HON. PAMELA K. CHEN
United States District Court Judge